

**UNITED STATES DISTRICT COURT**  
for the  
**District of Massachusetts**

) Case No. \_\_\_\_\_

) *(to be filled in by the Clerk's Office)*

Tamesha Bowens

**Plaintiff(s)**

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

1) Department of Children & Families  
2) Judge George Phelan  
3) Quincy Police Department  
4) Edison / Ronald Cross

**Defendant(s)**

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

FILED  
IN CLERK'S OFFICE

FEB 24 2020  
W.M.G. 36

**COMPLAINT FOR A CIVIL CASE**

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Tamesha Bowens

Department of Children & Families

Street Address

Andres Dugel Park 37 Neponset Avenue

City and County

Boston

State and Zip Code

Massachusetts MA 02122

Telephone Number

857-762-9228

E-mail Address

Tamesha.Bowens19@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

## Defendant No. 1

Name DCF: Alexis Lamb, Terri Ellis, Beth Terri (supervisor)  
 Job or Title (if known) Caseworker, Investigator/ supervisor  
 Street Address forbes Rd  
 City and County Braintree  
 State and Zip Code MA  
 Telephone Number \_\_\_\_\_  
 E-mail Address (if known) \_\_\_\_\_

## Defendant No. 2

Name Judge George Phelan  
 Job or Title (if known) Judge  
 Street Address 35 Shawmut Rd, ca  
 City and County Canton  
 State and Zip Code MA 02021  
 Telephone Number 781-832-1200  
 E-mail Address (if known) \_\_\_\_\_

## Defendant No. 3

Name Quincy Police Department  
 Job or Title (if known) ~  
 Street Address 1 Dennis Ryan PKWY  
 City and County Quincy  
 State and Zip Code MA 02169  
 Telephone Number 617-411-1650  
 E-mail Address (if known) \_\_\_\_\_

## Defendant No. 4

Name EDISON CROSS / Ronald CROSS  
 Job or Title (if known) Hotel / Unemployed  
 Street Address 77 Baxter Avenue  
 City and County Quincy  
 State and Zip Code MA 02169  
 Telephone Number \_\_\_\_\_  
 E-mail Address (if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*Violation of Civil Right  
Violation of 5th/4th amendment Rights*

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

*N/A*

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_ and has its principal place of business in the State of (name) \_\_\_\_\_

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_ Or is a citizen of (foreign nation) \_\_\_\_\_

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):  
\_\_\_\_\_  
\_\_\_\_\_

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/24/2020

Signature of Plaintiff



Printed Name of Plaintiff

Tarnesha Boren

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney



Printed Name of Attorney



Bar Number



Name of Law Firm



Street Address



State and Zip Code



Telephone Number



E-mail Address

- VIOLATED MY DAUGHTER Amendment Right
- Deemed me Neglected of my child without (914119) fitting the definition But added To the Definition
- Neglect filed against mother for violence in front of child
- Neglect unsupported against Dad, But records prove Dad was violent to mother in front of child
- Bias findings of Neglect, mother(writer) is a Black poor women. Father is a middle class white male with attorney.
- requested mom has supervised visits with child But Dad has no restrictions although Dad was in the care of her ROTE HIGH care giver twice to change worker
- Denied twice to change worker
- defamation of character

relief:

- To compensated for pain, suffering and Defamation of character \$ 50,000
- To Be compensated for emotion distress of me and my child
- To Be compensated for loss wages
- To have my worker switched
- To have DCF respect my daughter and I rights and not intervene in our relationship/family
- Compensation of \$ 75,000

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U.S. DISTRICT COURT  
N.D. OF OHIO

NO. 1:20-CV-10391-MW-122

1) On 3/20/2020 Judge Phelan Session, The Judge  
overruled never stated His name on the record. I had  
to ask a court officer His name and I was told judge  
Liquia Edreidous in a Hostile manner  
2) Treated wither (Tame or severe) demands  
3) Deprived me from my civil rights  
4) Discrimination. The Judge stated to write  
"I believe the problem", you have a problem with everybody  
before the hearing, but had assured me and I was told  
process of failure to comply with complaint  
5) Interference or failure to comply with complaint  
6) Making public comment on pending case  
or which shows prejudice  
7) To remove Judge of my case due to bias  
Treatment of myself and civil  
2) To have Judge respect our 5th and 14th amendment  
rights  
3) To have my civil removed at the order  
4) To transfer case to Boston  
5) To respect my conductor and I didn't  
to maintain relationship without state interfere  
6) Compensation for pain suffering and violation  
of 121 rights 15,000

19W0560  
Document#

Date of Hearing: 3/20/2020  
Date of Trial: 4/21/2020  
Courtroom# 4  
Time: 9:30 AM

Quincy Police Department Case 1:20-cv-16301-EGS Document 1 Filed 02/27/20 Page 1 of 12  
Chief John Dugan, Dispatcher Trish, Officer First Name  
Amanda (Defendants) (3)

- false reporting of neglect against mom 11/18/19 was screened out
- denied wellness check of a child
- discrimination due to race/class
- wrongful arrest when called for wellness check
- false inaccurate reporting
- violation of 42 U.S. Code § 1983. Civil action for deprivation of rights
- harassment
- dishonesty
- coercion
- abuse of authority
- created issue to increase the likelihood of a wrongful conviction
- contributing to systematic misconduct
- refusal to investigate child endangerment reports
- refusal to protect and serve
- refusal to take report which is against my civil rights
- actions violated my 5th and 14th Amendment Rights
- relief
  - all parties held accountable for actions
  - compensation of 75,000 for pain and suffering due to discrimination and unfair treatment
  - ③ TO have my rights respected
  - ④ TO have my child removed from the town of Quincy to a place with her peers, where my child safety and civil rights are respected
  - ⑤ TO have reports corrected or removed
  - ⑥ ~~⑦~~ compensation for defamation of character and malice intent

- ON 8/12/19 There was no restraining order in place. I went TO PICK UP my Daughter Ronald Cross called the Police SO I coulnt PICK UP my child (essentially kidnapping my child)
- Deprived me from my child and property VIOLATION OF my Daughter and I 5<sup>th</sup> & 14<sup>th</sup> Amendment Rights
- TOOK away a car that was Brouant for my daughter and I
- Held my child and property away from me with malice intent
- Defamation of Character
- accussed me of Being abusive with no facts
- called me and my child Racial Slurs
- constantly used Police as a weapon call numerous times for no crime

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- relief
- Compensation for pain and suffering 75,000  
Malice intent
- return of vehical or TO pay the cost of purchasing a new one 11,000
- TO return my Daughter and I Belongings
- TO respect my Daughter and I Civil and Constitutional Rights
- TO return all mail and personal Belongings
- The cost of new furniture for my Daughter and I TOTALING \$1,970.97
- loss wages from Dec 6 until 2/24/20  
at 22.33hrly